

Defendants”) were residents of the Southern District of Ohio and were employed as customer service representatives of Fifth Third Bank.

COUNT 1
(Conspiracy to Commit Bank Fraud)

The Conspiracy

4. Paragraphs 1 and 3 of the Indictment are incorporated as if fully restated herein. From on or about 2018 and continuing through on or about August 2020, in the Southern District of Ohio and elsewhere, the defendants, **KEYONTE BRONSON (a/k/a “Dom”), JUAN LEONARD (a/k/a “Tim”), DUANE GRIGSBY, MARCUS KNOX (a/k/a “Sleepy”), PATRICK H. WALKER (a/k/a “Sin Wolf”), GREGORY PALMER (a/k/a “Cook LaFlare”), DIAMOND BROCKS, KINESHA CAVITT, KELLIELE BERRY, JALEN ROWE, and SHARNESE DAVIS**, and others known and unknown to the Grand Jury, knowingly, and with intent to further the conspiracy and to defraud, conspired and agreed with each other and with others known and unknown to the Grand Jury to execute a scheme and artifice to defraud a financial institution, namely Fifth Third Bank, whose deposits were insured by the Federal Deposit Insurance Corporation (“FDIC”), and to obtain monies, funds, credits, and property owned by and under the custody and control of Fifth Third Bank by means of materially false and fraudulent pretenses, representations, and promises, in violation of 18 U.S.C. §§ 1344 and 2.

Purpose and Object of the Conspiracy

5. The purpose and object of the conspiracy was for the defendants, **DUANE GRIGSBY, MARCUS KNOX (a/k/a “Sleepy”), KEYONTE BRONSON (a/k/a “Dom”), JUAN LEONARD (a/k/a “Tim”), PATRICK H. WALKER (a/k/a “Sin Wolf”), GREGORY PALMER (a/k/a “Cook LaFlare”), DIAMOND BROCKS, KINESHA CAVITT,**

KELLIELE BERRY, JALEN ROWE, and SHARNESE DAVIS, and others known and unknown to the grand jury, to unlawfully enrich themselves by wrongfully obtaining Fifth Third Bank's customer account information, creating false identification documents based on the account information, and then using the false identification documents to impersonate the bank customers to obtain money from Fifth Third by fraud.

The Manner and Means of the Conspiracy

6. The manner and means by which the defendants, **DUANE GRIGSBY, MARCUS KNOX** (a/k/a "Sleepy"), **KEYONTE BRONSON** (a/k/a "Dom"), **JUAN LEONARD** (a/k/a "Tim"), **PATRICK H. WALKER** (a/k/a "Sin Wolf"), **GREGORY PALMER** (a/k/a "Cook LaFlare"), **DIAMOND BROCKS, KINESHA CAVITT, KELLIELE BERRY, JALEN ROWE, and SHARNESE DAVIS** sought to accomplish the objectives of the conspiracy included the following:
 - a. It was part of the conspiracy that members of the conspiracy, known and unknown to the Grand Jury, solicited employees of Fifth Third Bank in the customer service department (including the Employee Defendants) to steal account information pertaining to bank customer accounts.
 - b. The bank employee conspirators were paid to steal customer account information and provide such account information to other members of the conspiracy.
 - c. After identifying bank customer accounts that had significant cash balances, the bank employee conspirator (including the Employee Defendants) wrongfully copied or photographed the customer account information, including personal

identifying information of the customer, and provided the information to other members of the conspiracy.

- d. Members of the conspiracy, known and unknown to the Grand Jury, identified and recruited individuals to enter into a Fifth Third Bank branch to withdraw or attempt to withdraw money from the compromised customer accounts. These individuals, referred to as "Runners," were often homeless or had substance abuse problems.
- e. In order to execute these attempted withdrawals, members of the conspiracy used the Runners to pose as account customers by creating false identification cards or drivers licenses for the Runner, which used a photo of the Runner with the personal information of the real bank customer. In some instances, members of the conspiracy would drive the Runner to a thrift store in order to dress the Runner appropriately for the picture and pose as customers during the bank branch visits.
- f. Members of the conspiracy, known and unknown to the Grand Jury, would then drive the Runner to a Fifth Third Bank branch in order to attempt to withdraw funds from the compromised bank accounts. The Runner would enter the Fifth Third Bank branch with the false identification card and attempt to make a withdrawal. The withdrawals were typically in the \$3000-\$8000 range. If the attempted withdrawal was successful, the Runner would be paid a small amount and the co-conspirators would take the rest of the fraudulently obtained money.
- g. The conspiracy was executed by the Defendants primarily in Greater Cincinnati and Northern Kentucky.

In violation of 18 U.S.C. § 1349.

COUNTS 2-9
(Aggravated Identity Theft)

7. On or about the following dates, in the Southern District of Ohio, the defendants identified below, aided and abetted by others known and unknown to the Grand Jury, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: Bank Fraud and Conspiracy to Commit Bank Fraud in violation of 18 U.S.C. §§ 1344, 1349, knowing that the means of identification belonged to another actual person identified below:

Count	Defendant	Date, on or about	Initials of Actual Person	Means of Identification transferred, possessed, and used
2	Duane Grigsby	9/26/2018	N.J.	Social security number, date of birth, account number, and driver's license number.
3	Marcus Knox	11/15/2018	B.S.	Social security number and date of birth.
4	Gregory Palmer	11/23/2018	V.L.	Social security number, date of birth, account number, and driver's license number.
5	Keyonte Bronson	2/21/2019	K.C.	Social security number, date of birth, account number, and driver's license number.
6	Keyonte Bronson Patrick Walker	10/4/2019	J.M.	Social security number, date of birth, account number, and driver's license number.
7	Keyonte Bronson Patrick Walker	10/17/2019	N.C.	Social security number, date of birth, account number, and driver's license number.
8	Keyonte Bronson Patrick Walker	11/25/2019	J.L.	Social security number, date of birth, account number, and driver's license number.

Count	Defendant	Date, on or about	Initials of Actual Person	Means of Identification transferred, possessed, and used
9	Keyonte Bronson Patrick Walker	11/5/2019	D.H.	Social security number, date of birth, account number, and driver's license number.

In violation of 18 U.S.C. §§ 1028A(a)(1) and 2.

FORFEITURE ALLEGATION 1

Upon conviction of the offense set forth in Count 1 of this Indictment, the defendants, **KEYONTE BRONSON** (a/k/a "Dom"), **JUAN LEONARD** (a/k/a "Tim"), **DUANE GRIGSBY**, **MARCUS KNOX** (a/k/a "Sleepy"), **PATRICK H. WALKER** (a/k/a "Sin Wolf"), **GREGORY PALMER** (a/k/a "Cook LaFlare"), **DIAMOND BROCKS**, **KINESHA CAVITT**, **KELLIELE BERRY**, **JALEN ROWE**, and **SHARNESE DAVIS** shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation, including but not limited to, a sum of money equal to the amount of proceeds the defendants obtained as a result of the offense.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1), to seek forfeiture of any other property of the defendants, up to the value of the property described above.

A TRUE BILL.



FOREPERSON

DAVID M. DEVILLERS
UNITED STATES ATTORNEY



TIMOTHY S. MANGAN, 069287
ASSISTANT UNITED STATES ATTORNEY